

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

DAIMLER TRUCKS NORTH AMERICA
LLC, a Delaware limited liability company, fka
FREIGHTLINER LLC, a Delaware limited
liability company,

Plaintiff,

v.

RAMIN YOUNESSI, an Illinois resident,

Defendant.

Case No. FILED: MAY 19, 2008
08 cv 2893 JH
The Honorable JUDGE LEFKOW
MAGISTRATE JUDGE DENLOW

**PLAINTIFF'S MOTION TO QUASH SUBPOENAS SERVED ON JOHN D. REA,
ALBERTO GERENA AND LUIGI CASTILLO OR, IN THE ALTERNATIVE, FOR A
PROTECTIVE ORDER**

Plaintiff Daimler Trucks North America LLC, f/k/a Freightliner LLC ("Daimler Trucks"), respectfully moves this Court pursuant to Federal Rule of Civil Procedure 45(c) for an order quashing the subpoenas served by Defendant Ramin Younessi ("Younessi") on non-parties John D. Rea, Alberto Gerena, and Luigi Castillo for the reasons set forth in the accompanying supporting memorandum. In the alternative, Daimler Trucks respectfully moves this Court for a protective order relieving compliance with the subpoenas until the United States District Court for the District of Oregon has ruled on Younessi's pending motion to compel and Daimler Trucks' pending 12(b)(6) motion to dismiss Younessi's counterclaim for invasion of privacy, both of which bear directly on the issues raised in this Motion and the accompanying supporting memorandum.

Dated: May 19, 2008

Respectfully submitted,

DAIMLER TRUCKS NORTH AMERICA
LLC, f/k/a FREIGHTLINER LLC

/s/ Daniel M. Cordis

One of its Attorneys

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Motions To Appear Pro Hac Vice Pending

CERTIFICATE OF SERVICE

I, Daniel M. Cordis, hereby certify that on May 19, 2008 I caused to be served a true and correct copy of the foregoing **Plaintiff's Motion To Quash Third-Party Subpoenas Or, In The Alternative, For A Protective Order** and corresponding **Notice of Motion** by hand delivery on the following individuals:

Robin Hulshizer
Mark Mester
Alan Devlin
Cameron Krieger
Latham & Watkins LLP
Sears Tower, Suite 5800
233 South Wacker Drive
Chicago, IL 60606
Of Attorneys for Defendant Ramin Younessi

I, Daniel M. Cordis, hereby certify that on May 19, 2008 I caused to be served a true and correct copy of the foregoing **Plaintiff's Motion To Quash Third-Party Subpoenas Or, In The Alternative, For A Protective Order** and corresponding **Notice of Motion** by depositing the same in the U.S. mail chute at 321 North Clark Street, Chicago, Illinois 60610, postage prepaid, and addressed to the following individual:

Bruce C. Hamlin
Lane Powell PC
601 SW 2nd Ave., Suite 2100
Portland, OR 97204
Of Attorneys for Defendant Younessi

/s/ Daniel M. Cordis

Daniel M. Cordis